

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF MINNESOTA**  
*Criminal No. 22-CR-124(2) (NEB)*

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UNITED STATES OF AMERICA, )  
 )  
Plaintiff, )  
vs. )  
 )  
Mohamed Jama Ismail, )  
 )  
Defendant )  
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**DEFENDANT’S MOTION  
FOR VARIANCE**

The Defendant, by and through his counsel, respectfully moves the Court for a departure and a variance from the sentencing guidelines.

This motion is made upon all the files and pleadings herein, the Defendant’s position with regard to sentencing, and upon further points and authorities as may subsequently be presented to the Court.

Dated: October 2, 2024

Respectfully submitted,

By: /s/ Patrick L. Cotter  
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